



MURIEL GOODE-TRUFANT Acting Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT

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August 7, 2024

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## **VIA ECF**

Hon. Jessica G. L. Clarke Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007

Re: A.P. v. New York City Dep't of Educ., et al., 24-cv-1877 (JGLC)

Dear Judge Clarke:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. ("IDEA").

I write pursuant to Rule 2(e) of Your Honor's Individual Rules to respectfully request a four-week extension of the commencement of the briefing schedule (ECF No. 15) from August 19 to September 16, 2024. Plaintiff consents to this request. This is defendant's fourth request for an extension, and the Court granted defendant's previous three requests. (ECF Nos. 11, 17, and 21).

Defendants have completed their internal review process and relayed an initial settlement offer to Plaintiff on July 17, 2024, which Plaintiff is considering. The proposed extension should allow the parties to hopefully reach a settlement and obviate the need to brief this matter.

Thus, Defendants respectfully request that the briefing schedule be extended for Plaintiff's Opening Brief from August 19 to September 16, 2024, Defendant's Opposition from September 16 to October 14, 2024, and Plaintiff's Reply from September 30 to October 28, 2024.

Thank you for considering this request.

Respectfully submitted, /s/ Courtney M. Soliday

Courtney M. Soliday, Esq. Special Assistant Corporation Counsel

cc: Nicolas Apter-Vidler, Esq. (via ECF)

Application GRANTED. Plaintiff's brief due **September 16**, **2024**, Defendant's opposition due **October 14**, **2024**, and Plaintiff's reply due **October 28**, **2024**. No further extensions will be granted. The Clerk of Court is directed to terminate ECF No. 25.

SO ORDERED.

Dated: August 9, 2024

New York, New York

JESSICA G. L. CLARKE United States District Judge